

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Sharonn E. Thomas
Debtor,

JPMorgan Chase Bank, National Association
Movant.

v.

Sharonn E. Thomas
Debtor/Respondent,

Terry P. Dershaw, Trustee
Additional Respondent.

BANKRUPTCY CASE NUMBER
18-17430-elf

CHAPTER 7

**RESPONSE OF JPMORGAN CHASE BANK, NATIONAL ASSOCIATION TO
MOTION OF TRUSTEE, TERRY P. DERSHAW, ESQUIRE, TO SELL CERTAIN
REAL ESTATE ASSETS FREE AND CLEAR OF LIENS AND ENCUMBRANCES
SURCHARGE CERTAIN SECURED CREDITORS AND RESOLVE CERTAIN
DISPUTES**

JPMorgan Chase Bank, National Association, by and through its counsel, LOGS Legal Group LLP, hereby responds to Debtor's Motion of Trustee, Terry P. Dershaw, Esquire, to Sell Certain Real Estate Assets Free and Clear of Liens and Encumbrances Surcharge Certain Secured Creditors and Resolve Certain Disputes, and in support thereof states JPMorgan Chase Bank, National Association does not oppose a sale of the subject real property known as 2338 N. Gratz Street, Philadelphia. , it would request that any order regarding the sale of the subject property include language that JPMorgan Chase Bank, National Association will be paid in full at closing, by the title company, pursuant to a proper payoff statement, and that any short-sale must be approved by JPMorgan Chase Bank National Association.

It appears from Schedule A that Respondent is to be paid in full at closing.

/s/ Kristen D. Little

Christopher A. DeNardo 78447

Kristen D. Little 79992

LOGS Legal Group LLP

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CERTIFICATE OF SERVICE

I, Kristen D. Little, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of the foregoing by First Class Mail, postage prepaid, at the respective last known address of each person set forth below on this December 8, 2021 :

Sharonn E. Thomas
856 North 29th St.
Philadelphia, PA 19130

Damien Nicholas Tancredi, Esquire, Flaster Greenberg P.C.
1835 Market Street
Suite 1050
Philadelphia, PA 19103
Damien.Tancredi@flastergreenberg.com - VIA ECF

Terry P. Dershaw, Trustee
P.O. Box 556
Warminster, PA 18974
PA66@ecfbis.com - VIA ECF

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

/s/ Kristen D. Little

Christopher A. DeNardo 78447

Kristen D. Little 79992

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ORDER

AND NOW, this _____ day of _____, 2021, upon consideration of the Motion of Trustee, Terry P. Dershaw, Esquire, to Sell Certain Real Estate Assets Free and Clear of Liens and Encumbrances Surcharge Certain Secured Creditors and Resolve Certain Disputes and Respondent's response thereto;

It is hereby ORDERED that Motion of Trustee, Terry P. Dershaw, Esquire, to Sell Certain Real Estate Assets Free and Clear of Liens and Encumbrances Surcharge Certain Secured Creditors and Resolve Certain Disputes is GRANTED so long as:

1. The outstanding mortgage owed to JPMorgan Chase Bank on the property located at 2338 N. Gratz Street, Philadelphia, Pennsylvania is paid in full; and
2. Should the proposed transaction not pay JPMorgan Chase Bank in full, that transaction needs to be approved by JPMorgan Chase Bank prior to settlement.

BY THE COURT:

HONORABLE ERIC L. FRANK
UNITED STATES BANKRUPTCY JUDGE